

1 MCDERMOTT WILL & EMERY LLP
2 Jeffrey M. Reisner (State Bar No. 143715)
3 jreisner@mwe.com
4 Kerri A. Lyman (State Bar No. 241615)
5 klyman@mwe.com
2049 Century Park East, Suite 3200
Los Angeles, California 90067-3206
Telephone: (310) 277-4110
Facsimile: (310) 277-4730

7 *Attorneys for Davey Tree Expert Company,
Davey Tree Surgery Company,
8 and Davey Resource Group, Inc.*

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 In re: Case No. 19-30088 (DM)
12 PG&E CORPORATION Chapter 11
13 and (Lead Case)
14 PACIFIC GAS AND ELECTRIC CO., (Jointly Administered)
15 Debtors.
16
17 Affects PG&E Corporation
18 Affects Pacific Gas and Electric
19 Company
20 Affects both Debtors

20 *All papers shall be filed in the Lead Case,
21 No. 19-30088 (DM).

23 TO THE BANKRUPTCY COURT, DEBTORS, AND ALL OTHER PARTIES IN INTEREST:

24 PLEASE TAKE NOTICE THAT Davey Tree Expert Company, Davey Tree Surgery
25 Company, and Davey Resource Group, Inc. (collectively, “Davey”), have retained McDermott
26 Will and Emery LLP, as their attorney of record in the above-captioned chapter 11 cases (the
27 “Chapter 11 Cases”) in place of and instead of Irell & Manella LLP.

1 PLEASE TAKE NOTICE THAT, pursuant to Rules 2002, 9007 and 9010 of the Federal
2 Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), section 1109(b) of title 11 of the United
3 States Code, 11 U.S.C. § 101 et seq. (“Bankruptcy Code”), and N.D. Cal. Local Rule 5-1(c)(2)(A)
4 and (C), the counsel listed below enter their appearance for Davey and request that Davey be
5 added to the official mailing matrix and service lists in the Chapter 11 Cases and that copies of all
6 pleadings, motions, notices, and other papers, filed or served, in these cases or any proceeding
7 herein, be served upon the below-listed counsel at the following mailing or e-mail addresses or
8 facsimile numbers:

9 Jeffrey M. Reisner, Esquire
10 Kerri A. Lyman, Esquire
11 McDERMOTT WILL & EMERY
12 2049 Century Park East, Suite 3200
13 Los Angeles, CA 90067-3206
Telephone: (310) 277-4110
Facsimile: (310) 277-4730
jreisner@mwe.com
klyman@mwe.com

14 PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 1109(b) of the
15 Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the
16 above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders and notices of
17 applications, motions, petitions, pleadings, requests, complaints, disclosure statements, plans, or
18 demands, whether formal or informal, written or oral or transmitted or conveyed by mail delivery,
19 telephone, telegraph, or otherwise, in the Chapter 11 Cases.

20 PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance, nor any
21 former or later appearance, pleading, claim or suit shall constitute a consent to jurisdiction, nor
22 shall it waive any right of Davey to: (1) have final orders in any non-core or core matter in which
23 the Bankruptcy Court does not have final adjudicatory authority entered only after de novo review
24 by a District Court Judge; (2) trial by jury in any proceeding so triable in these cases or any case,
25 controversy or proceeding related to these cases; (3) have the District Court withdraw reference in
26 any matter subject to mandatory or discretionary withdrawal; (4) object to the jurisdiction of the
27 Bankruptcy Court for any purpose or on any grounds; or (5) assert any other rights, claims,
28 actions, defenses, including defenses to jurisdiction, setoffs or recoupments to which Davey may

1 be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses,
2 setoffs and recoupments are expressly reserved.

3
4

5 MCDERMOTT WILL & EMERY LLP

6
7

8 By: 
Jeffrey M. Reisner

9
10 *Attorneys for Davey Tree Expert Company,
Davey Tree Surgery Company, and Davey
Resource Group, Inc.*

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28